

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA

IN RE:	)	Case No. 23-80623
	)	
DANNIE L. BENNETT, JR., AND	)	MOTION BY DEBTOR TO
MARIA J. BENNETT,	)	CONVERT TO CHAPTER 7
	)	
Debtors.	)	

The Motion of the above Debtors, respectfully represents:


1. Movants are the Debtors in the above-entitled case, having filed a Voluntary Petition for relief under Chapter 13 of Title 11, United States Code on August 11, 2023.
2. This case has not been converted under any chapter of Title 11, United States Code.
3. The Debtors are persons who may be Debtors under Chapter 7 of the Bankruptcy Code.
4. The Debtors hereby request conversion of this case to a case under Chapter 7 of the Bankruptcy Code.

WHEREFORE, Debtors pray this Court enter an Order for conversion of this case to a case under Chapter 7 of Title 11, United States Code, pursuant to 11 U.S.C. §1307.

Dated this 10<sup>th</sup> day of October, 2024.

DANNIE L. BENNETT, JR., AND MARIA J. BENNETT, Debtors

By: MORROW, POPPE  
WATERMEIER & LONOWSKI P.C.  
A Limited Liability Organization  
201 North 8th Street, Suite 300  
P.O. Box 83439  
Lincoln, Nebraska 68501-3439  
(402) 474-1731

By: /s/Joel G. Lonowski   
Joel G. Lonowski #19078

**NOTICE OF OBJECTION/RESISTANCE DEADLINE**

To: Creditors and Interested Parties Described Below:

On October 10, 2024, the Debtors filed their Motion to Convert to Chapter 7, and resistance to the Debtors' Motion should be filed on or before October 31, 2024, with the Clerk of the United States Bankruptcy Court, 100 Centennial Mall North, Room 460, Lincoln, Nebraska 68508, and a copy served upon the undersigned.

In the event that no objections are filed, an Order on the Debtors' Motion shall be entered by the United States Bankruptcy Judge without further notice to any parties.

In the event any resistance to the Debtors' Motion is filed an a hearing is required, then the Clerk of the Court will set a date and time for hearing. Any resistance should comply with Neb.R.Bankr.P. 9013-1.

Dated this 10<sup>th</sup> day of October, 2024.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which sent notification of such filing to the following:

United States Trustee  
Chapter 13 Trustee

and I hereby certify that I have mailed by United States mail, postage prepaid, the foregoing document to the following non CM/ECF participants:

all Creditors on Debtors' Mailing Matrix attached hereto

/s/Joel G. Lonowski   
Joel G. Lonowski #19078

Label Matrix for local noticing  
0867-8  
Case 23-80623-BSK  
District of Nebraska  
Omaha Office  
Wed Oct 9 16:03:12 CDT 2024

ACAR Leading LTD d/b/a GM Financial Leasing  
PO Box 183853  
Arlington, TX 76096-3853

ACAR Leasing Ltd. Dba GM Financial Leasing  
c/o Michael P Gaughan  
10484 Marty St  
Overland Park, KS 66212-2559

Ally Bank Lease Trust - Assignor to Vehicle  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Ally Bank c/o AIS Portfolio Services, LLC  
4515 N. Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

BMO Bank N.A., c/o AIS Portfolio Services, L  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Nationstar Mortgage LLC  
14841 Dallas Parkway, Suite 350  
Dallas, TX 75254-7685

(p)NATIONSTAR MORTGAGE LLC  
PO BOX 619096  
DALLAS TX 75261-9096

Wells Fargo Bank, N. A.  
6818 Grover St. #302  
Omaha, NE 68106-3632

Wells Fargo Bank, N.A  
P.O. Box 1629  
Minneapolis, MN 55440-1629

US Bankruptcy Court  
111 South 18th Plaza  
Suite 1125  
Omaha, NE 68102-1321

ACAR Leasing LTD d/b/a GM Financial Leasing  
P.O. Box 183853  
Arlington, TX 76096-3853

BMO Bank, N.A.  
1 Corporate Drive, Suite 360  
Lake Zurich, IL 60047-8945

Bank of America  
PO Box 15284  
Wilmington, DE 19850-5284

Bank of the West  
PO Box 4021  
Alameda, CA 94501-0421

Capital One  
PO Box 60519  
City of Industry, CA 91716-0519

Capital One N.A.  
by American InfoSource as agent  
PO Box 71083  
Charlotte, NC 28272-1083

Capital One Spark  
PO Box 60519  
City of Industry, CA 91716-0519

Citi  
PO Box 790046  
Saint Louis, MO 63179-0046

Citibank, N.A.  
5800 S Corporate Pl  
Sioux Falls, SD 57108-5027

Dan Bennett, Sr.  
835 South 67th Avenue  
Omaha, NE 68106-1115

Discover Bank  
Discover Products Inc  
PO Box 3025  
New Albany, OH 43054-3025

Discover Card  
PO Box 6103  
Carol Stream, IL 60197-6103

Douglas E. Quinn  
1601 Dodge Street  
Suite 3700  
Omaha, NE 68102-1627

HEA Corporation  
816 South 180th Avenue  
Elkhorn, NE 68022-6917

HEA Corporation  
c/o Erickson Sederstrom, PC, LLO  
Registered Agent  
10330 Regency Parkway Drive, Suite 100  
Omaha, NE 68114-3736

Internal Revenue Service  
Centralized Insolvency Operation  
PO Box 7346  
Philadelphia, PA 19101-7346

Jay D. Koehn  
1601 Dodge Street, Suite 3700  
Omaha, NE 68102-1627

(p)JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

Jordan Mellican  
1601 Dodge Street, Suite 3700  
Attn: Douglas E. Quinn  
Omaha, NE 68102-1627

LVNV Funding, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

(p)NEBRASKA DEPARTMENT OF REVENUE  
ATTN ATTENTION BANKRUPTCY UNIT  
PO BOX 94818  
LINCOLN NE 68509-4818

Pay Pal  
PO Box 71718  
Philadelphia, PA 19176-1718

Renee Mellican  
1601 Dodge Street, Suite 3700  
Omaha, NE 68102-1627

Sarpy County Attorney  
1210 Golden Gate Drive, Suite 6001  
Papillion, NE 68046-2839

Sarpy County Treasurer  
1102 Easte 1st Street, Suite 4  
Papillion, NE 68046

Small Business Administration  
14925 Kingsport Road  
Fort Worth, TX 76155-2243

Small Business Administration  
District Counsel  
10675 Bedford Avenue, Suite 100  
Omaha, NE 68134-3605

Synchrony Bank  
by AIS InfoSource LP as agent  
PO Box 4457  
Houston, TX 77210-4457

Wells Fargo Bank  
PO Box 10335  
Des Moines, IA 50306-0335

Wells Fargo Bank, N.A.  
Default Document Processing  
MAC# N9286-01Y  
P.O. Box 1629  
Minneapolis, MN 55440-1629

Dannie L. Bennett Jr  
13411 Lochmoor Circle  
Bellevue, NE 68123-3772

Erin McCartney  
Chapter 13 Trustee  
13930 Gold Circle  
Ste 201  
Omaha, NE 68144-2304

Jerry L. Jensen  
Acting United States Trustee  
Roman L. Hruska U.S. Trustee  
111 S. 18th Plaza, Suite 1148  
Omaha, NE 68102-1321

Joel G. Lonowski  
Morrow Poppe Law Offices  
201 No. 8th Street, Suite 300  
Lincoln, NE 68508-2257

Jordan Mellican

Maria J. Bennett  
13411 Lochmoor Circle  
Bellevue, NE 68123-3772

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Nationstar Mortgage LLC  
Attn: Bankruptcy Department  
PO Box 619096  
DALLAS, TX 75261 United States

Jefferson Capital Systems LLC  
Po Box 7999  
Saint Cloud MN 56302-9617

(d)Nationstar Mortgage LLC  
Attn: Bankruptcy Department  
PO Box 619096  
Dallas, Texas 75261-9741

(d)Nationstar Mortgage LLC  
PO Box 619096  
Dallas, TX 75261-9741

Nebraska Department of Revenue  
Attn: Bankruptcy Unit  
Nebraska State Office Building  
PO Box 94818  
Lincoln, NE 68509-4818

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Ally Bank, c/o AIS Portfolio Services, LLC  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

(u)BMO Bank N.A.

(u)BMO Harris Bank, N.A.,

(u)HEA Corporation

(u)Nationstar Mortgage LLC

(d)Wells Fargo Bank, N.A.  
6818 Grover St. #302  
Omaha, NE 68106-3632

(d)Wells Fargo Bank, N.A.  
P.O. Box 1629  
Minneapolis, MN 55440-1629

(d)Ally Bank c/o AIS Portfolio Services, LLC  
4515 N. Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

(d)Bank of the West  
PO Box 4021  
Alameda, CA 94501-0421

(u)Renee Mellican

End of Label Matrix  
Mailable recipients 46  
Bypassed recipients 10  
Total 56